1

2

3

4

5

6

7

8

9

10

11

JOEL SOTO CEJA,

v.

12 KRISTI NOEM, et al.,

ll l

14

13

. _

15 16

17

18

19

20

21 | 22 |

23

24

WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES DISTRICT COURT

Case No. 2:25-cv-00926-JHC

STIPULATED MOTION TO DISMISS AND ORDER

Defendants.

Plaintiff,

Pursuant to Federal Rule of Civil Procedure 41(a), the parties stipulate to the dismissal of this case without prejudice. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S. Citizenship and Immigration Services ("USCIS") to adjudicate his Form I-918. Plaintiff filed a concurrent emergency motion for temporary restraining order and stay of removal. Pursuant to this Court's order, the motion was granted, and Plaintiff's removal was stayed pending further order of the Court. USCIS has adjudicated the application and this case is moot. Plaintiff anticipates seeking attorneys' fees and costs. Defendants will oppose this request.

STIPULATED MOTION TO DISMISS & ORDER [Case No. 2:25-cv-00926-JHC] - 1

Respectfully submitted, TEAL LUTHY MILLER LAW OFFICES OF CAROL L. EDWARD & Acting United States Attorney ASSOCIATES, P.S. 3 s/ Michelle R. Lambert s/ Martha Muldowney MICHELLE R. LAMBERT, NYS #4666657 MARTHA MULDOWNEY, WSBA# 52670 Assistant United States Attorney Law Offices of Carol L. Edward & United States Attorney's Office Associates, P.S. 820 S. 2nd Street Western District of Washington Mount Vernon, Washington 98273 1201 Pacific Avenue, Suite 700 Tacoma, Washington 98402 Phone: 360-336-0185 Phone: (206) 553-7970 Email: martha@seattle-immigration.com Fax: (206) 553-4067 Attorneys for Plaintiff Email: michelle.lambert@usdoj.gov Attorneys for Defendants I certify that this memorandum contains 105 10 words, in compliance with the Local Civil Rules. 11 12 13 14 15 16 17 18 19 20 21 22 23 24

STIPULATED MOTION TO DISMISS & ORDER [Case No. 2:25-cv-00926-JHC] - 2

ORDER The case is dismissed without prejudice. It is so **ORDERED**. DATED this 9th day of June, 2025. United States District Judge